

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

RICHARD LEHMAN, on behalf of himself and  
others similarly situated,

Plaintiffs,

v.

WARNER NELSON; WILLIAM BECK, JR.,  
BRIAN BISH, KLAAS A. DeBOER;  
MICHAEL G. MARSH; ROCKY SHARP;  
RICHARD BAMBERGER; DENNIS CALLIES,  
CLIF DAVIS, TIM DONOVAN; HARRY  
THOMPSON; GARY YOUNGHANS; CLINT  
BRYSON; MICHAEL CHURCH; MICHAEL  
DOYLE; GREG ELDER; GLEN FRANZ;  
GARY GONZALES; CARL D. HANSON;  
PATRICK POWELL; GARY PRICE; SCOTT  
STEPHENS; ROGER TOBIN; and GRANT  
ZADOW, in their capacity as Trustees of the  
IBEW Pacific Coast Pension Plan,

Defendants.

No. 2:13-cv-01835

STIPULATION AND ORDER SETTING  
SCHEDULE FOR DISCOVERY AND  
MOTIONS REGARDING DAMAGES  
AND ATTORNEYS' FEES

**STIPULATION**

Pursuant to Local Civil Rule 7(d)(1), Plaintiff Class and Defendants (the "Parties") jointly submit the following proposed schedule of proceedings in the instant litigation, consistent with this Court's Order Granting Plaintiffs' Second Motion For Summary Judgment, Dkt. No. 122 at 12. The Parties request the following deadlines for discovery pertaining to damages, a motion on damages, and a motion for attorneys' fees:

STIPULATION AND ORDER

2:13-cv-01835 – 1

4815-5428-9243v.1 0098279-000001

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LAW OFFICES  
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Seattle, WA 98101-3045  
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1. Defendants shall provide Class Counsel with all discovery to accurately determine damages, consistent with this Court's prior orders on Summary Judgment, by fourteen days after this Court's decision on Defendants' pending Motion for Reconsideration, Dkt. No. 123;
2. The Parties shall file a stipulated Motion for Damages by twenty eight days after this Court's decision on Defendants' pending Motion for Reconsideration;
3. Plaintiff Class shall file a Motion for Attorneys' Fees and Costs by twenty four days after this Court's decision on the Parties' stipulated Motion for Damages;
4. Defendants shall file any Opposition to the Plaintiff Class's Motion for Attorneys' Fees by twenty four days after the Plaintiff Class files its Motion for Attorneys' Fees; and
5. Plaintiff Class shall file any Reply by seventeen days after the Defendants file their Opposition to Plaintiff's Motion for Attorneys' Fees.

1 DATED this 31st day of February, 2018.

2 Davis Wright Tremaine LLP  
3 Attorneys for Richard Lehman and the Class

4  
5 By /s/ Joseph P. Hoag  
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16 Counsel for Defendants

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26  
27

**ORDER**

IT IS SO ORDERED.

DATED this 5 day of February 2018.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

DAVIS WRIGHT TREMAINE LLP  
Attorneys for Plaintiffs

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